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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAY 16 1997

Federal Communications Commission
Office of Secretary

In the Matter of)
) WT Docket No. 97-81
Amendment of the Commission's)
Rules Regarding Multiple)
Address Systems)

To: The Commission

REPLY COMMENTS

Paging Network, Inc. ("PageNet"), by its attorneys and pursuant to 47 C.F.R. §§ 1.415 and 1.419, hereby submits its Reply Comments in the above-captioned proceeding.¹ In support of these Reply Comments, the following is respectfully shown:

I. Interest of PageNet

PageNet, through its subsidiaries, is the largest paging carrier in the United States, serving over 9 million mobile units. PageNet utilizes multiple address systems ("MAS") to control some of its paging operations.² As an incumbent MAS licensee, PageNet has a compelling interest in this proceeding.

II. The Commission Should Not Proceed With The Licensing of 900 MHz MAS Frequencies At This Time

PageNet is in accord with the joint comments of AirTouch Paging and Arch Communications Group in that they oppose the FCC's proposal to revise the geographic scope of the MAS

¹ Amendment of the Commission's Rules Regarding Multiple Address Systems, Notice of Proposed Rulemaking, WT Docket No. 97-81, released February 27, 1997 ("Notice").

² In addition, PageNet has pending applications for additional MAS spectrum on file with the FCC.

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frequencies to market area licensing at this time. PageNet believes that the Commission and the industry need to take a step backward and review the timing of the assignment of licenses in the 900 MHz bandwidth, rather than proceed by either lottery or auction now. PageNet is very concerned that the 900 MHz MAS frequencies, which could be useful for future narrowband services, will become even more speckled with service offerings that are not geographically or spectrally efficient, or uses which could better be achieved upon different frequencies in the future. In other words, PageNet does not believe it useful to further license 900 MHz MAS spectrum until the needs of the marketplace can be better understood vis-a-vis narrowband messaging.

Companies like PageNet are presently rolling out new and innovative narrowband systems that have different capacity needs than traditional numeric paging. These services, such as voice and alpha paging and two-way paging, have a higher information content, and have broader capacity needs, no matter how efficiently offered. Yet, no one knows with certainty the extent to which these services will predominate in the market and the extent and scope of business and consumer demand. Certainly, the demand for additional spectrum in the narrowband area does not exist today.

Nonetheless, one expects the demand for new services of all sorts to be significant in a few years, as these services are introduced and their benefits understood in the marketplace. However, the scope of the total market penetration and thus the

timing of the demand for frequencies and their channelization and geographic scope will not be totally understood until the marketplace data can be observed and quantified. Until then, PageNet does not believe it appropriate to conduct further licensing of the 900 MHz MAS frequencies.

III. Incumbent MAS Facilities Should Retain Their Present Co-Channel Protection

PageNet strongly supports the Notice's tentative conclusion that, "in the event that the FCC adopts geographic licensing [for multiple address systems], the public interest would best be served by allowing incumbent MAS licensees to continue operating under their current authorizations."³ To achieve this result, the Commission should allow incumbent licensees to continue to operate MAS facilities consistent with the existing 70-mile co-channel mileage separation standard of Section 22.625 of the Rules.⁴

Under the Commission's existing assignment policy for MAS facilities, a MAS master station is assumed to have a standard 25-mile radius service contour and is entitled to a 70-mile minimum distance separation between co-channel stations.⁵ PageNet utilizes MAS facilities to control paging base stations

³ Notice at ¶ 19.

⁴ Section 22.625 requires a minimum distance separation between co-channel fixed master station transmitters in the 928-960 MHz bands of 70 miles. See 47 C.F.R. § 22.625(a).

⁵ See Amendment of Sections 22.501(g)(2) and 94.65(a)(1) of the Rules and Regulations to Re-Channel the 900 MHz Multiple Address Frequencies, 3 FCC Rcd 1564, 1569 (1988).

that are varying distances from its MAS master station. These distances range from less than one mile to 54 miles from the MAS master station. As such, although MAS facilities are assumed to have a 25-mile service contour, PageNet, like other licensees, is authorized to use its MAS facilities to control base stations that are well beyond the assumed 25-mile service contour. For this reason, at a minimum, the Commission must license all future MAS systems based upon the existing minimum distance separation standard under Section 22.625 of the Commission's Rules.


Applying the existing minimum distance separation standard to co-channel incumbent and future MAS facilities should provide incumbent MAS licensees with the minimum co-channel separation required to continue to operate their systems, and will also promote efficient spectrum use for future MAS licensees.⁶ Accordingly, applying the current minimum distance separation standards to existing incumbent MAS facilities in the future is in the public interest.

⁶ See 3 FCC Rcd at 1569.

WHEREFORE, for the foregoing reasons, PageNet requests that the Commission adopt rules in accordance with the Reply Comments herein presented.

Respectfully submitted,

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